

EXHIBIT 2

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**[PROPOSED] ORDER GRANTING
GOOGLE LLC'S MOTION TO SEAL
PORTIONS OF CLASS
CERTIFICATION & DAUBERT
BRIEFING**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

Action Filed: July 14, 2020

Trial Date: Not Set

Before the Court is Defendant Google LLC's Statement in Support of Motion to Seal Portions of Class Certification & *Daubert* Briefing (Dkts. 314 & 321) and documents filed therewith.

Having considered Plaintiffs' Administrative Motion to Seal Portions of Motion for Class Certification [Dkt. 315] and Google's Statement in Support of Motion to Seal Portions of Class Certification & *Daubert* Briefing, the Declaration of David Monsees, and the Declaration of Kevin Lam, the Court finds that the material identified in Google's Statement in Support should be sealed.

Accordingly, the Court orders that the following should be sealed:

The following exhibits and expert reports attached to Plaintiffs' Motion for Class Certification ("Motion") [Dkt. 315]:

Exhibit No.	Bates No. / Pages with Designations	Description
<u>Plaintiffs' Motion for Class Certification</u>	<u>Page 2, lines 4-5</u>	<u>Internal metrics</u>
	<u>Page 2, lines 20 - 22</u>	<u>Internal strategy</u>
	<u>Page 3, lines 5 - 7</u>	<u>Internal strategy</u>
	<u>Page 3, lines 10 - 12</u>	<u>Internal strategy</u>
	<u>Page 3, lines 13 - 17</u>	<u>Internal strategy</u>
	<u>Page 6, line 24</u>	<u>Non-public metric</u>
	<u>Page 11, lines 14 - 15</u>	<u>Internal processes</u>
	<u>Page 12, lines 18 - 19</u>	<u>Internal deliberations</u>
	<u>Page 13, lines 14 - 16</u>	<u>Internal processes</u>
	<u>Page 13, lines 17 - 18</u>	<u>Internal processes</u>
	<u>Page 13, lines 19 - 20</u>	<u>Internal processes</u>
	<u>Page 13, lines 21 - 22</u>	<u>Internal processes</u>
	<u>Page 13, line 23</u>	<u>Internal processes</u>
	<u>Page 13, lines 24 - 26</u>	<u>Internal processes</u>
	<u>Page 13, lines 27 - 28</u>	<u>Internal processes</u>
	<u>Page 14, lines 2 - 4</u>	<u>Internal processes</u>
	<u>Page 14, lines 13 - 14</u>	<u>Internal metrics</u>
	<u>Page 14, lines 21 - 23</u>	<u>Internal processes</u>

Exhibit No.	Bates No. / Pages with Designations	Description
	<u>Page 14, line 24</u>	<u>Internal strategy</u>
	<u>Page 14, line 26 - 28</u>	<u>Internal strategy</u>
	<u>Page 15, lines 15 - 17</u>	<u>Internal deliberations</u>
	<u>Page 16, lines 6 - 7</u>	<u>Internal processes</u>
	<u>Page 16, lines 12 - 13</u>	<u>Internal processes</u>
	<u>Page 17, line 12</u>	<u>Internal metrics</u>
	<u>Page 17, lines 25 - 26</u>	<u>Internal deliberations</u>
	<u>Page 19, lines 22 - 24</u>	<u>Internal strategy</u>
	<u>Page 20, lines 1 - 2</u>	<u>Internal metrics</u>
	<u>Page 20, lines 3 - 11</u>	<u>Internal strategy</u>
	<u>Page 20, lines 11 - 12</u>	<u>Internal strategy</u>
	<u>Page 20, lines 13 - 14</u>	<u>Internal metrics</u>
	<u>Page 20, lines 15 - 19</u>	<u>Internal strategy and metrics</u>
	<u>Page 20, lines 20 - 23</u>	<u>Internal strategy and metrics</u>
	<u>Page 20, lines 23 - 24</u>	<u>Non-public metrics</u>
	<u>Page 21, lines 12 - 14</u>	<u>Non-public metrics</u>
	<u>Page 21, lines 15 - 16</u>	<u>Non-public metrics</u>
	<u>Page 21, lines 17 - 18</u>	<u>Non-public metrics</u>
	<u>Page 22, lines 6 - 7</u>	<u>Non-public metrics</u>
	<u>Page 22, lines 10 - 11</u>	<u>Non-public metrics</u>
	<u>Page 22, lines 11 - 13</u>	<u>Non-public metrics</u>
	<u>Page 24, lines 6 - 7</u>	<u>Internal metrics</u>
	<u>Page 24, lines 10 - 11</u>	<u>Internal processes</u>
	<u>Page 24, line 12</u>	<u>Internal processes</u>
	<u>Page 24, lines 13 - 14</u>	<u>Internal processes</u>
	<u>Page 24, line 15</u>	<u>Internal processes</u>
Exhibit 1	GOOG-RDGZ00117318 Complete document	Internal processes; Employee PII
Exhibit 2	GOOG-RDGZ-00209974	Internal terms
	GOOG-RDGZ-00209975	Employee PII
	GOOG-RDGZ-00209976	Employee PII
	GOOG-RDGZ-00210102	Internal strategy
Exhibit 5	GOOG-RDGZ-00144762	Internal strategy

Exhibit No.	Bates No. / Pages with Designations	Description
	GOOG-RDGZ-00144763	Internal processes
	GOOG-RDGZ-00144764	Internal processes
	GOOG-RDGZ-00144767	Internal processes
Exhibit 7	GOOG-RDGZ-00024709	Employee PII
	GOOG-RDGZ-00024710	Internal processes; Employee PII
	GOOG-RDGZ-00024711	Internal strategy; Employee PI
Exhibit 10	GOOG-RDGZ-00161367	Internal processes
	GOOG-RDGZ-00161373	Internal processes
	GOOG-RDGZ-00161378	Internal processes
	GOOG-RDGZ-00161384	Internal processes
	GOOG-RDGZ-00161385	Internal processes
	GOOG-RDGZ-00161392	Internal processes
	GOOG-RDGZ-00161393	Internal terms
	GOOG-RDGZ-00161394	Internal processes
	GOOG-RDGZ-00161395	Internal terms
	GOOG-RDGZ-00161396	Internal processes
	GOOG-RDGZ-00161397	Internal processes
	GOOG-RDGZ-00161398	Internal processes
	GOOG-RDGZ-00161399	Internal terms
	GOOG-RDGZ-00161401	Internal terms
	GOOG-RDGZ-00161406	Internal processes
	GOOG-RDGZ-00161408	Internal processes
	GOOG-RDGZ-00161409	Internal processes
	GOOG-RDGZ-00161410	Internal terms
	GOOG-RDGZ-00161411	Internal processes
	GOOG-RDGZ-00161412	Internal terms
	GOOG-RDGZ-00161414	Internal processes
	GOOG-RDGZ-00161417	Internal processes
	GOOG-RDGZ-00161418	Internal processes

Exhibit No.	Bates No. / Pages with Designations	Description
	GOOG-RDGZ-00161419	Internal processes
	GOOG-RDGZ-00161420	Internal terms
Exhibit 11	212:16 – 212:21	Internal processes
	213:8 – 213:9	Internal processes
	214:10 – 214:14; 214:18 – 214:21; 214:23 – 214:25	Internal processes
	215:1 – 215:5; 215:9 – 215:10; 215:15 – 215:24	Internal processes
	216:2 – 216:4	Internal processes
	217:3 – 217:6; 217:8 – 217:15	Internal processes
Exhibit 15	GOOG-RDGZ-00052784	Employee PII
	GOOG-RDGZ-00052785	Internal terms
	GOOG-RDGZ- 00052786 <u>00052787</u>	Internal terms
	GOOG-RDGZ-00052788	Internal terms
	GOOG-RDGZ-00052789	Internal processes
	GOOG-RDGZ-00052790	Internal strategy
	GOOG-RDGZ-00052791	Internal strategy
	GOOG-RDGZ-00052792	Internal terms
	GOOG-RDGZ-00052793	Internal terms
	GOOG-RDGZ-00052794	Internal strategy
	GOOG-RDGZ-00052795	Internal strategy
	GOOG-RDGZ-00052797	Internal strategy
	GOOG-RDGZ-00052798	Internal strategy
	GOOG-RDGZ-00052799	Internal processes Internal strategy
	GOOG-RDGZ-00052801	Internal strategy
	GOOG-RDGZ-00052805	Internal processes
	GOOG-RDGZ-00052806	Internal processes
	GOOG-RDGZ-00052807	Internal strategy

Exhibit No.	Bates No. / Pages with Designations	Description
	GOOG-RDGZ-00052809	Internal processes
	GOOG-RDGZ-00052811	Internal strategy
	GOOG-RDGZ-00052812	Internal strategy
Exhibit 17	Pg. 3	Internal processes
	Pg. 4	Internal processes
Exhibit 42	GOOG-RDGZ-00151998	Internal processes
	GOOG-RDGZ-00152018	Employee PII
	GOOG-RDGZ-00152027	Employee PII
	GOOG-RDGZ-00152029	Employee PII
	GOOG-RDGZ-00152040	Internal strategy
Exhibit 43	Pg. 4	Internal processes
	Pg. 5	Internal processes
Exhibit 54	GOOG-RDGZ-0090236	Internal terms; Employee PII
	GOOG-RDGZ-0090238	Internal processes
	GOOG-RDGZ-0090239	Employee PII
	GOOG-RDGZ-0090242	Internal processes
	GOOG-RDGZ-0090243	Employee PII
	GOOG-RDGZ-0090244	Internal processes
	GOOG-RDGZ-0090245	Internal processes
	GOOG-RDGZ-0090246	Internal processes
	GOOG-RDGZ-0090247	Internal processes
	GOOG-RDGZ-0090249	Internal processes
	GOOG-RDGZ-0090250	Internal processes
	GOOG-RDGZ-0090251	Internal processes
	GOOG-RDGZ-0090252	Internal processes
	GOOG-RDGZ-0090253	Internal processes
Exhibit 55	GOOG-RDGZ-00043294 Complete document	Internal processes; Internal strategy; Internal terms; Employee PII
Exhibit 56	112:21 – 112:25	Internal processes

Exhibit No.	Bates No. / Pages with Designations	Description
	113:1 – 113:2; 113:10 – 113:11	Internal processes
	114:8 – 114:11	Internal processes
	115:17 – 115:20	Internal processes
	116:1 – 116:8; 116: 7 <u>17</u> – 116:20	Internal processes
Exhibit 57	GOOG-RDGZ-00044356	Internal processes; Employee PII
Exhibit 59	GOOG-RDGZ-00173562	Internal processes; Employee PII
	GOOG-RDGZ- 00173562 <u>00173563</u>	Employee PII
Exhibit 61	GOOG-RDGZ-00129084	Internal processes; Employee PII
	GOOG-RDGZ-00129085	Internal processes; Employee PII
	GOOG-RDGZ-00129086	Employee PII
	GOOG-RDGZ-00129087	Employee PII
	GOOG-RDGZ-00129088	Employee PII
	GOOG-RDGZ-00129089	Employee PII
	GOOG-RDGZ-00129090	Employee PII
	GOOG-RDGZ-00129091	Internal terms; Employee PII
	GOOG-RDGZ-00129092	Internal terms; Employee PII
	GOOG-RDGZ-00129093	Internal terms; Employee PII
	GOOG-RDGZ-00129094	Internal terms; Employee PII
	GOOG-RDGZ-00129095	Internal processes; Internal terms; Employee PII
Exhibit 65	GOOG-RDGZ-00092072	Employee PII
	GOOG-RDGZ-00092097	Internal processes
	GOOG-RDGZ-00092098	Internal processes

Exhibit No.	Bates No. / Pages with Designations	Description
	GOOG-RDGZ-00092099	Internal strategy
	GOOG-RDGZ-00092100	Internal strategy
	GOOG-RDGZ-00092101	Internal strategy
Exhibit 68	GOOG-RDGZ-00129096	Internal terms; Employee PII
	GOOG-RDGZ-00129097	Employee PII
	GOOG-RDGZ-00129098	Employee PII
	GOOG-RDGZ-00129099	Employee PII
Exhibit 69	GOOG-RDGZ-0130381	Internal processes; Internal terms; Employee PII
Plaintiffs' Trial Plan ISO Motion for Class Certification	Pg. 1, Line 13	Internal processes
	Pg. 4, Lines 20 – 23, 24 – 25, 26	Internal processes; Internal terms
	Pg. 5, Lines 1 – 2, 19 – 22, 25 - 26	Internal processes; Internal terms

Split Cells

The following exhibits to ~~Plaintiffs' Administrative Motion to Seal Portions of~~ Google's
Opposition to Plaintiff's Motion for Class Certification [~~Dkt~~Dkts. 323 & 324]:

Exhibit No. / Document Title	Bates No. / Pages with Designations	Description
Exhibit 2	Pg. 4, lines 20-28	Internal processes
	Pg. 5, lines 1-6, 8-21	Internal processes
	Pg. 6, lines 12-28	Internal processes
	Pg. 7, lines 1-14, 23-28	Internal processes; Internal terms
	Pg. 8, lines 1-25	Internal processes; Internal terms
	Pg. 9, lines 1-24	Internal processes; Internal terms

Exhibit No. / Document Title	Bates No. / Pages with Designations	Description
	Pg. 10, lines 1-28	Internal processes; Internal terms
	Pg. 11, lines 1-28	Internal processes; Internal terms
	Pg. 12, lines 1-23	Internal processes; Internal terms
	Pg. 13, lines 1-28	Internal processes; Internal terms
	Pg. 14, lines 1-28	Internal processes; Internal terms
	Pg. 15, lines 1-28	Internal processes; Internal terms
	Pg. 16, lines 1-15, 17-28	Internal processes; Internal terms
	Pg. 17, lines 1-21	Internal processes; Internal terms
	Pg. 18, lines 1-25	Internal processes; Internal terms
	Pg. 19, lines 1-25	Internal processes; Internal terms
	Pg. 20, lines 1-26	Internal processes; Internal terms
	Pg. 21, lines 1-28	Internal processes; Internal terms
	Pg. 22, lines 1-28	Internal processes; Internal terms
	Pg. 23, lines 1-28	Internal processes; Internal terms
	Pg. 24, lines 1-24	Internal processes; Internal terms
	Pg. 25, lines 1-27	Internal processes; Internal terms
	Pg. 26, lines 1-28	Internal processes; Internal terms

Exhibit No. / Document Title	Bates No. / Pages with Designations	Description
	Pg. 27, lines 1-28	Internal processes; Internal terms
	Pg. 28, lines 1-28	Internal processes; Internal terms
	Pg. 29, lines 1-28	Internal processes; Internal terms
	Pg. 29, lines 1-14, 16-28	Internal processes; Internal terms
	Pg. 30, lines 1-7	Internal processes; Internal terms
Exhibit 3	GOOG-RDGZ-00056514 Complete document	Internal processes; Internal terms; Internal strategy; Employee PII
Exhibit 5	44:21-22	Internal processes; Internal terms
	72:16; 72:21	Internal processes; Internal terms
<u>Exhibit 6</u>	<u>Addressed in Exhibit 7 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</u>	
<u>Exhibit 6-A</u>	<u>Addressed in Exhibit 8 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</u>	
Exhibit 8	Pg. 4	Employee PII
<u>Exhibit 9</u>	<u>Addressed in Exhibit 5 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</u>	
<u>Exhibit 11</u>	<u>Addressed in Exhibit 1 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</u>	
Exhibit 13	Pg. 91, Footnote 280	Internal terms
Exhibit 14	Pg. 6, lines 24-28	Internal processes; Internal terms
	Pg. 7, lines 1-5, 6-16	Internal processes; Internal terms

Exhibit No. / Document Title	Bates No. / Pages with Designations	Description
<u>Exhibit 19</u>	<u>Addressed in Exhibit 1 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</u>	
Exhibit 21	Pg. 12, 4-5	Internal processes; Internal terms
	Pg. 14, lines 5-14, 23	Internal processes; Internal terms
	Pg. 15, lines 13, 17-18, 24-27	Internal processes; Internal terms
	Pg. 16, lines 1-28	Internal processes; Internal terms
	Pg. 17, lines 1-28	Internal processes; Internal terms
	Pg. 18, lines 1-21	Internal processes; Internal terms
	Pg. 19, lines 1-8	Internal processes; Internal terms

The following exhibits to Plaintiffs' ~~Administrative Motion to Seal Portions of Plaintiffs~~
Reply in support of Motion for Class Certification [Dkt. 333]:

Exhibit No.	Bates No. / Pages with Designations	Description
Plaintiffs' Reply in Support of Motion for Class Certification Dkt. 315	Pg. 12, Lines 9 – 11	Internal processes; Internal terms
<u>Exhibit 70</u>	<u>223:8</u>	<u>Internal data log details</u>
	<u>223:10</u>	<u>Internal data log details</u>
	<u>223:13</u>	<u>Internal data log details</u>
	<u>223:20</u>	<u>Internal data log details</u>
	<u>223:25</u>	<u>Internal data log details</u>
	<u>224:6</u>	<u>Internal data log details</u>
	<u>225:10</u>	<u>Internal data log identifiers</u>
	<u>225:13</u>	<u>Internal data log identifiers</u>

Exhibit No.	Bates No. / Pages with Designations	Description
	<u>225:17</u>	<u>Internal data log identifiers</u>
	<u>225:18</u>	<u>Internal data log identifiers</u>
	<u>225:19</u>	<u>Internal data log identifiers</u>
	<u>225:24</u>	<u>Internal data log details</u>
<u>Exhibit 71</u>	<u>GOOG-RDGZ-00149617</u>	<u>Internal strategy</u> <u>Internal terms</u>
Exhibit 71	GOOG-RDGZ-00149618	Internal processes; Internal strategy
	GOOG-RDGZ-00149619	Internal processes; Internal terms
	GOOG-RDGZ-00149620	Internal processes; Internal strategy; Internal terms; Employee PII
	GOOG-RDGZ-00149621	Internal processes; Internal strategy; Internal terms
	GOOG-RDGZ-00149622	Internal processes; Internal strategy; Internal terms
	<u>GOOG-RDGZ-00149623</u>	<u>Internal strategy</u> <u>Internal terms</u>
	GOOG-RDGZ-00149624	Internal processes; Internal strategy; Internal terms
	GOOG-RDGZ-00149625	Internal processes; Internal strategy; Internal terms
	GOOG-RDGZ-00149626	Internal processes; Internal strategy; Internal terms; Employee PII
	GOOG-RDGZ-00149628	Internal processes; Internal strategy; Internal terms
	<u>GOOG-RDGZ-00149630</u>	<u>Internal strategy</u>

The following exhibits to ~~Plaintiffs' Administrative Motion to Seal Portions of~~ Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert Michael J. Lasinski [Dkt. 326]:

Exhibit No.	Bates No. / Pages with Designations	Description
<u>Google LLC's Notice of Motion and Motion to Exclude Opinion of Plaintiffs' Damage Expert M.J. Lasinski</u>	<u>Page 4, line 9</u>	<u>Non-public metric</u>
	<u>Page 4, line 17</u>	<u>Non-public metric</u>
	<u>Page 5, line 4</u>	<u>Non-public metric</u>
	<u>Page 5, line 5</u>	<u>Non-public metric</u>
	<u>Page 12, line 10</u>	<u>Non-public metric</u>
	<u>Page 13, line 8</u>	<u>Non-public metric</u>
	<u>Page 13, line 11</u>	<u>Non-public metric</u>
	<u>Page 13, line 13</u>	<u>Non-public metric</u>
	<u>Page 13, line 16</u>	<u>Non-public metric</u>
	<u>Page 14, line 1</u>	<u>Non-public metric</u>
	<u>Page 14, line 10</u>	<u>Non-public metric</u>
	<u>Page 14, line 24</u>	<u>Non-public metric</u>
	<u>Page 24, Footnote 13</u>	<u>Non-public metric</u>
Exhibit 1	24:13	Internal processes
	26:13 - 14, 26:16, 26:19 - 26:21	Internal processes
	28:4 - 28:10	Internal processes; Internal strategy
	57:25	Internal processes; Internal strategy
	58:1 - 58:7	Internal processes; Internal strategy
	59:7 - 59:12	Internal processes
	61:2 - 61:3, 61:5, 61:7 - 61:8, 61:11 - 61:12, 61:24 - 61:25	Internal processes; Internal strategy

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Exhibit No.	Bates No. / Pages with Designations	Description
	62:1 – 62:2	Internal processes; Internal strategy
	71:4 – 71:9	Internal processes; Internal strategy
	74:17 – 74:19, 74:21 – 74:25	Internal processes; Internal strategy
	76:22 – 76:23	Internal processes; Internal terms
	77:4 – 77:25	Internal processes; Internal terms
	78:1 – 78:25	Internal processes; Internal terms
	79:1 – 79:14, 79:22 – 79:25	Internal processes; Internal terms
	80:1 – 80:3	Internal processes; Internal terms
	81:10 – 81:25	Internal processes; Internal terms
	82:1 – 82:25	Internal processes; Internal terms
	83:1 – 83:6, 83:16 – 83:25	Internal processes; Internal terms
	84:1 – 84:5, 84:13 – 84:25	Internal processes; Internal terms
	85:14 – 85:18, 85:22, 85:25	Internal processes; Internal terms
	86:1 – 86:3, 86:7 – 86:10, 86:13 – 86:15, 86:17 – 86:19, 86:24 – 86:25	Internal processes; Internal terms
	87:1 – 87:6, 87:15 – 87:25	Internal processes; Internal terms
	88:3 – 88:9, 88:19 – 88:21, 88:24 – 88:25	Internal processes; Internal terms
	89:3 – 89:17, 89:21 – 89:25	Internal processes; Internal terms
	90:1 – 90:25	Internal processes; Internal terms
	91:1 – 90:25	Internal processes; Internal terms
	92:1 – 92:5, 92:10 – 92:25	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	93:1 – 93:25	Internal processes; Internal terms
	94:1	Internal processes
	119:12 – 119:16	Internal processes
	120:17	Internal terms
	121:14 – 121:16	Internal processes
	122:15 – 122:25	Internal processes; Internal terms
	123:1 – 123:8, 123:13 – 123:24	Internal processes; Internal terms
	137:21 – 137:25	Internal processes; Internal terms
	138:1 – 138:6	Internal processes; Internal terms
	139:8 – 139:25	Internal processes; Internal terms
	140:1 – 140:7, 140:15 – 140:18, 140:22 – 140:24	Internal processes
	141:1 – 141:3, 141:6 – 141:14	Internal processes; Internal terms
	142:8 – 142:10, 142:13 – 142:22	Internal processes; Internal terms
	143:13 – 143:25	Internal processes; Internal terms
	144:11 – 144:25	Internal processes; Internal terms
	145:1 – 145:5	Internal processes; Internal terms
	151:11 – 151:15, 151:25	Internal processes; Internal terms
	152:1 – 152:8, 152:13 – 152:18, 152:23 – 152:25	Internal processes; Internal terms
	153:1 – 153:25	Internal processes; Internal terms
	154:1 – 154:25	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	155:4 – 155:25	Internal processes; Internal terms
	161:17 – 161:20, 161:22 – 161:25	Internal processes; Internal terms
	162:9 – 162:21	Internal processes; Internal terms
	163:4 – 163:7, 163:12 – 163:15, 163:23 – 163:25	Internal processes; Internal terms
	164:1 – 164:3, 164:15 – 164:25	Internal processes; Internal terms
	165:1 – 165:7, 165:13 – 165:25	Internal processes; Internal terms
	166:1 – 166:15, 166:17 – 166:20	Internal processes; Internal terms
	167:9 – 167:11, 167:21 – 23	Internal processes; Internal terms
	168:13 – 168:16, 168:19 – 168:21, 168:25	Internal processes; Internal terms
	169:1 – 169:5, 169:10 – 169:25	Internal processes; Internal terms
	170:1 – 170:25	Internal processes; Internal terms
	171:1 – 171:25	Internal processes; Internal terms
	172:12 – 172:25	Internal processes; Internal terms
	173:1 – 173:13	Internal processes; Internal terms
	174:14 – 174:25	Internal processes; Internal terms
	175:1 – 175:25	Internal processes; Internal terms
	176:1 – 176:14	Internal processes; Internal terms
	178:15 – 178:25	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	179:1 – 179:25	Internal processes; Internal terms
	180:1 – 180:25	Internal processes; Internal terms
	181:4 – 181:25	Internal processes; Internal terms
	182:1 – 182:23	Internal processes; Internal terms
	183:11 – 183:25	Internal processes; Internal terms
	184:1 – 184:11	Internal processes; Internal terms
	185:17 – 185:25	Internal processes; Internal terms
	186:1 – 186:7, 186:22 – 186:25	Internal processes; Internal terms
	187:1 – 187:17	Internal processes; Internal terms
	190:17 – 190:19	Internal processes; Internal terms
	191:12 – 191:18	Internal processes; Internal terms
	199:6 – 199:19	Internal processes; Internal terms
	200:21 – 200:24	Internal processes; Internal terms
	201:1 – 201:25	Internal processes; Internal terms
	202:1 – 202:25	Internal processes
	203:1 – 203:25	Internal processes; Internal terms
	204:1 – 204:15, 204:23 – 204:25	Internal processes; Internal terms
	205:1 – 205:26	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	206:1 – 206:24	Internal processes; Internal terms
	207:1 – 207:22	Internal processes; Internal terms
	208:3 – 208:6, 208:11 – 208:25	Internal processes; Internal terms
	209:1 – 209:13	Internal processes; Internal terms
	210:2 – 210:7, 210:9 – 210:25	Internal processes; Internal terms
	211:4 – 211:25	Internal processes
	212:4 – 212:15	Internal processes; Internal terms
	224:24 – 224:25	Internal processes
	225:1 – 225:46, 225:10, 225:12, 225:14 – 225:22	Internal processes; Internal terms metrics
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Exhibit 8	Pg. 21	Employee PII
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Exhibit 10	Pg. 5, Lines 19, 23 – 26	Internal processes; Internal terms

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The following briefing and exhibits to ~~Plaintiffs' Administrative Motion to Seal Portions~~
of Plaintiffs' Opposition to Google's Motion to Exclude Opinion of Michael J. Lasinski [Dkt.
331]:

Exhibit No.	Bates No. / Pages with Designations	Description
Plaintiffs' Opposition to Google's Motion to Exclude Opinion of Michael J. Lasinski	Pg. 3, Lines 25 – 28	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
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	Pg. 5, Line 25	Internal processes
	Pg. 12, Lines 19 – 20	Internal processes
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	Pg. 14, Lines 22-24	Internal processes; Internal terms
	Pg. 23, Lines 1-3	Internal processes; Internal terms
<i>Exhibit 1</i>	<i>Duplicative of Exhibit 1 to Google's Motion to Exclude Opinion of Michael J. Lasinski</i>	
<u><i>Exhibit 3</i></u>	<u><i>Duplicative of Exhibit 3 to Google's Motion to Exclude Opinion of Michael J. Lasinski</i></u>	
Exhibit 5	187:23-24	Internal terms
<u><i>Exhibit 6</i></u>	<u><i>Duplicative of Exhibit 15 to Plaintiffs' Motion for Class Certification</i></u>	
<u><i>Exhibit 7</i></u>	<u>GOOG-RDGZ-00188469</u> <u>Complete document</u>	<u>Internal processes,</u> <u>Internal terms</u>
Exhibit 9	GOOG-RDGZ-00028472	Internal processes; Internal terms
	GOOG-RDGZ-00028473	Internal processes; Internal terms
	GOOG-RDGZ-00028474	Internal processes; Internal terms
	GOOG-RDGZ-00028475	Internal processes; Internal terms
	GOOG-RDGZ-00028476	Internal processes; Internal terms
	GOOG-RDGZ-00028477	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
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	GOOG-RDGZ-00028479	Internal processes; Internal terms
	GOOG-RDGZ-00028480	Internal processes; Internal terms
	GOOG-RDGZ-00028481	Internal processes; Internal terms
	GOOG-RDGZ-00028482	Internal processes; Internal terms; Internal strategy
	GOOG-RDGZ-00028483	Internal processes; Internal terms; Internal strategy
	GOOG-RDGZ-00028484	Internal processes; Internal terms; Internal strategy

The following pages in the Expert Report of Jonathan E. Hochman dated March 22, 2023 and Appendices filed within:

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	Pg. 5, Para. 2	Internal strategy
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	Pg. 23, Footnote 32	Internal terms
	Pg. 24, Para. 54	Internal terms
	Pg. 24, Para. 55	Internal processes
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	Pg. 26, Footnote 39	Internal terms
	Pg. 29, Para. 64	Internal terms
	Pg. 33, Para. 73	Internal strategy
	Pg. 33, Footnote 60-62	Internal strategy

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	Pg. 50-52, Para. 110	Internal processes; Internal strategy
	Pg. 50, Footnote 92	Internal strategy
	Pg. 52, Para. 112	Internal terms
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	Pg. 58-59, Para. 127	Internal processes
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	Pg. 67, Footnote 107	Internal processes; Internal terms
	Pg. 68, Footnote 108	Internal processes; Internal strategy
	Pg. 71, Footnote 113-114	Internal processes; Internal strategy
	Pg. 72, Para. 149	Internal processes; <u>Employee PII Plaintiffs'</u> <u>designations</u>
	Pg. 73, Para. 152	Employee PII

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	Pg. 79, Footnote 120	Internal processes; Internal terms
	Pg. 80, Para. 168	Internal processes; Internal strategy
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	Pg. 81-82, Para. 171	Internal processes; Internal strategy
	Pg. 82, Paras. 173-174	Internal processes; Internal strategy
	Pg. 83-84, Paras. 175-177	Internal processes; Internal strategy
	Pg. 83, Footnote 128	Internal processes; Internal strategy
	Pg. 85, Para. 179	Internal terms
	Pg. 86, Para. 182	Employee PH Plaintiffs' designations
	Pg. 88, Paras. 188-189	Internal processes; Internal terms
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	Pg. 89, Footnote 131	Internal processes Plaintiffs' designations
	Pg. 91-92, Para. 192	Internal processes; Internal strategy Plaintiffs' designations
	Pg. 94, Para. 198	Internal terms
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Exhibit No.	Bates No. / Pages with Designations	Description
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	Pg. 101, Paras. 217-218	Internal terms
	Pg. 102,-103 Paras. 220-222	Internal processes; Internal strategy
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Exhibit No.	Bates No. / Pages with Designations	Description
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	Pg. 137-138, Paras. 318-319 and Footnote 162	Internal terms
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	Pg. 157, Para. 375	Internal processes; Internal strategy
	Pg. 162, Para. 388	Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	Pg. 168, Para. 411	Internal processes; Internal strategy
	Pg. 168, Footnote 180	Internal processes; Internal strategy
Appendix E	Pg. 5 Footnote 16	Internal processes
	Pg. 7, Para. 13	Internal terms
	Pg. 10, Paras. 20-21	Internal processes; Internal strategy
	Pg. 10, Footnote 24	Internal processes
	Pg. 11-13, Paras. 23-26	Internal processes; Internal strategy
	Pg. 14, Para. 28	Internal processes; Internal terms
Appendix G	Pg. 1, Table of Contents	Internal terms
	Pg. 11, Para. 26	Internal terms
	Pg. 11, Heading 2.1	Internal terms
	Pg. 11-30, Paras. 28-73	Internal processes; Internal strategy; Internal terms
	Pg. 31, Para. 74	Internal strategy; Internal terms
	Pg. 32, Paras. 79-80	Internal strategy; Internal terms
	Pg. 33, Paras. 83-85	Internal processes; Internal terms
	Pg. 34-37, Paras. 86-98	Internal processes; Internal strategy; Internal terms
	Pg. 37, Para. 100	Internal terms
	Pg. 39, Para. 106	Internal processes; Internal terms
	Pg. 40-41 ,Paras. 109-113	Internal processes; Internal terms
Appendix I	Pg. 42-43, Paras. 115-121	Internal processes; Internal terms
	Pg. 44-101	Internal processes; Internal strategy; Internal terms
	Pg. 5, Paras. 13-14	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	Pg. 10, Para. 36	Internal processes
	Pg. 28-29, Paras. 65-66	Internal processes; Internal strategy;
Appendix K	Complete Document	Internal processes; Internal strategy; Internal terms

Accordingly, the Court orders that the above-noted information should be sealed.

IT IS SO ORDERED.

DATED: _____

Honorable Richard Seeborg
United States District Judge